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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CR No. 07-0055 JSW
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME
v.)	
)	
MARIO ALBERTO INCHAURREGUI-)	
VELASQUEZ,)	
)	
Defendant.)	

On March 15, 2007, the parties in this case appeared before the Court and stipulated that time should be excluded from the Speedy Trial Act calculations from March 15, 2007 to March 29, 2007 for effective preparation of counsel, in that defense counsel has recently received discovery from the Government; additional discovery was still forthcoming from the Government; and the parties are preparing a plea agreement. The parties represented that granting the continuance was necessary for effective preparation of counsel, taking into account the exercise of due diligence. See 18 U.S.C. § 3161(h)(8)(B)(iv).

1 SO STIPULATED:

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3 SCOTT N. SCHOOLS
Interim United States Attorney

4 DATED: March 19, 2007

5 /s/
DENISE MARIE BARTON
6 Assistant United States Attorney

7 DATED: March 19, 2007

8 /s/
STEVEN J. KOENINGER
9 Attorney for MARIO ALBERTO
INCHAUREGUI-VELASQUEZ

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12 As the Court found on March 15, 2007, and for the reasons stated above, the Court finds that
13 the ends of justice served by the continuance outweigh the best interests of the public and the
14 defendant in a speedy trial and that time should be excluded from the Speedy Trial Act
15 calculations from March 15, 2007 to March 29, 2007 for effective preparation of counsel. See 18
16 U.S.C. §3161 (h)(8)(A). The failure to grant the requested continuance would deny counsel
17 reasonable time necessary for effective preparation, taking into account the exercise of due
18 diligence, and would result in a miscarriage of justice. See 18 U.S.C. §3161(h)(8)(B)(iv).
19

20 SO ORDERED.

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22 DATED: March 20, 2007

23 
Jeffrey S. White
United States District Court Judge